

**Response of  
Wisconsin Power and Light Company  
to  
The Public Service Commission of Wisconsin  
Data Request No. 3.08**

Docket Number: 05-CE-137  
 Date of Request: March 11, 2009  
 Information Requested By: Ken Detmer  
 Date Responded: March 30, 2009  
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 Witness: (If other than Author)

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Follow-up to Question 1.12: p. 25 Table 4: Why doesn't Table 4 include an analysis of an SCR on Unit 4 and an SNCR on Unit 5?

**Response:**

Table 4 includes only a select set of possible scenarios that could be analyzed to understand the impact to compliance with Phase II RACT requirements from installing air emission controls at the Edgewater units. In its analysis, WPL observed that Scenario 2 (installing SNCR/RR1 on Unit 4 and SCR on Unit 5) produces an outcome with larger compliance margins than the scenario identified in this data request (installing SCR on Unit 4 and SNCR on Unit 5). While both of these scenarios have a positive compliance margin and, as such, meet Phase II RACT requirements, WPL believes that the compliance margin associated with the scenario identified in this data request ("SCR on Unit 4 and SNCR on Unit 5") is not sufficiently large to insure that WPL can maintain compliance under varying operational conditions it experiences over time. For reference, WPL has also included a scenario showing the scenario identified in this data request ("SCR on Unit 4 and SNCR on Unit 5") combined with Edgewater Unit 3 retirement. See Table 1, below.

Table 1: Compliance Margin

WEPCO Share of Unit 5	Scenario 2 (Unit 4 SNCR/RR1; Unit 5 SCR)	Alternative Scenario A (Unit 4 SCR; Unit 5 SNCR)	Alternative Scenario B (Unit 3 Retired; Unit 4 SCR; Unit 5 SNCR)
Included	10.5%	2.0%	7.4%
Not Included	5.9%	4.4%	11.7%